

Your response

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<p>Question 1:</p> <p>a) Do you agree with our characterisation of the ways in which mobile calls enter the UK? Please give an explanation for your answer where appropriate.</p> <p>b) What do you think is the relative importance and / or significance of each of the different routes used for calls to enter the UK? Please provide evidence for your answer.</p> <p>c) If you provide mobile services to UK consumers, what international gateway provider(s) does your organisation use (including in-house services)? In addition, please explain the nature of the international gateway services you rely on.</p>	<p>Confidential? – N</p> <p>a) Yes. We agree with Ofcom’s characterization. Calls can originate from various routes, including direct international calls and those routed through international gateway providers. As long as there exist IP to PSTN gateways in the UK, there is always the potential for calls spoofing UK mobile numbers to enter the UK from abroad through these non-PSTN gateways as well. Each route presents unique challenges, particularly in validating the legitimacy of the calling number.</p> <p>b) The significance of these routes varies. Direct calls may pose a higher risk of spoofing due to less stringent controls, while international gateway providers often have established protocols that can mitigate risks. Evidence suggests that as opportunities to spoof fixed numbers diminish, scammers are increasingly turning to spoofing UK mobile numbers, indicating a shift in tactics.</p> <p>c) N/A</p>
<p>Question 2:</p> <p>What variables and factors should we take into account when considering whether – and, if so, how - to address the harms caused by spoofed UK mobile numbers?</p>	<p>Confidential? – N</p> <p>Factors to consider include volume of spoofed calls, consumer awareness levels, technological capabilities of telecom service providers and solutions vendors, the regulatory landscape, and ultimately the monetary losses from impersonation spoofing scams. Additionally, understanding the demographics of affected consumers can help tailor solutions and consumer education effectively. The potential for scammers to exploit gaps in regulations, especially as technology evolves, should also be a key consideration.</p>
<p>Question 3:</p> <p>a) What is the scope and scale of consumer harm caused by spoofed UK mobile numbers?</p> <p>b) What are the consumer impacts of spoofed UK mobile numbers more broadly?</p>	<p>██████████</p> <p>████</p>

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<p>Please provide evidence to support your responses.</p>	
<p>Question 4:</p> <p>a) How significant is the volume of spoofed mobile calls from abroad?</p> <p>b) Is there any evidence that scammers are moving from spoofing fixed to mobile UK CLI?</p> <p>Please provide evidence to support your responses.</p>	<p>██████████</p> <p>████</p>
<p>Question 5:</p> <p>How will developments in deployment of mobile technologies in the UK and abroad affect the problem of spoofed UK mobile calls from abroad? Please provide evidence to support your response.</p>	<p>Confidential? – N</p> <p>Developments in mobile technologies could complicate the spoofing issue by providing new avenues for fraudsters. As more of communications transitions to IP end-to-end, as more traffic utilizing UK telephone numbers goes over the top through various applications and interfaces, traditional international gateways may no longer be the best place to enforce border policies around the use of UK mobile numbers.</p>
<p>Question 6:</p> <p>a) What is your preferred option for addressing scam calls made from abroad using spoofed UK mobile numbers, and why (including the pros and cons of the different solutions)?</p> <p>b) Do you think it is possible to identify a solution that could be implemented relatively quickly now, and which would enable implementation of a more robust and effective solution in the future? If yes, what solution fits these criteria? Please give an explanation for your response.</p> <p>c) What would be the advantages and disadvantages of obtaining more information about, and oversight of, the international gateway providers</p>	<p>Confidential? – N</p> <p>a) Our preferred option for addressing scam calls from abroad using spoofed UK mobile numbers is a comprehensive approach that combines regulatory measures with industry collaboration. Implementing a multi-faceted solution including call authentication (i.e., STIR) protocols layered with robocall mitigation AI/ML analytics could enhance call verification and reduce the incidence of spoofing.</p> <p>b) Yes, a basic solution could be implemented quickly, such as enhancing existing DNO lists and other deterministic call blocking measures, which would lay the groundwork for more robust solutions in the future, like AI/ML robocall mitigation analytics and STIR-based call authentication. For example, establishing a centralized database for roaming numbers could streamline the verification process.</p>

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<p>which bring calls into UK networks, in the context of tackling use of telecommunications networks to facilitate fraud and scams? Please give an explanation for your response.</p> <p>d) What would be the advantages and disadvantages of industry-led solutions, and where might regulatory intervention be required? Please give an explanation for your response.</p>	<p>c) Obtaining more information about international gateway providers could enhance accountability and transparency, but it may also lead to increased operational costs and regulatory burdens for these providers. But without significant insight into how many spoofed calls are traversing such international gateways today (versus entering the UK through other paths), it is difficult to assess the potential efficacy of regulation and operational controls at such gateways. Ultimately, a balance must be struck between oversight and operational efficiency.</p> <p>d) Industry-led solutions can be effective in rapidly addressing spoofing, but regulatory intervention may be necessary to ensure compliance and standardization across the industry. Collaborative efforts between regulators and telecom providers can foster innovation while maintaining consumer protection.</p>
<p>Question 7: Are there any international experiences of tackling this issue that you think are particularly relevant for the UK? Please provide evidence and an explanation for your answer.</p>	<p>Confidential? – N</p> <p>International experiences, particularly the STIR/SHAKEN framework implemented in the US, Canada, France, and Brazil, provide valuable lessons for the UK. These frameworks have demonstrated effectiveness in identifying and reducing spoofed calls and enhancing consumer trust in telecommunications. Additionally, countries like Australia and Ireland have adopted specified measures to verify the legitimacy of incoming calls, which could serve as models for the UK.</p>
<p>Question 8:</p> <p>Are the factors outlined in the section ‘framework for evaluating options’ the right things to think about when making a decision on options to address spoofed UK mobile numbers, and are there any additional factors which we should consider? Please explain your response where appropriate.</p>	<p>Confidential? – N</p> <p>The factors outlined in the impact assessment framework are relevant, but additional considerations should include consumer education initiatives to raise awareness about spoofing and the role of technology in enhancing call verification. Engaging consumers in the solution process can foster greater trust and cooperation, ultimately leading to more effective outcomes.</p>

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